

REQUEST FOR INFORMATION

1. General Information About the Company

- a. State the correct legal name of the Company.

Victory Engineering Corporation ("the Company")

- b. Identify the legal status of the Company (corporation, partnership, sole proprietorship, specify if other) and the state in which the Company was organized.

The Company is a Delaware corporation.

- c. State the name(s) and address(es) of the President and the Chairperson of the Board of the Company.

President: Frank J. Mascuch
P.O. Box 702
Oldwick, New Jersey 08858

Chairman of the Board: Richard Mascuch
3E Dorado Drive
Convent Mews
Morristown, New Jersey 07960

- d. If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify these related companies and state the name(s) and address(es) of the President(s) and the Chairperson(s) of the Board of those organizations. Provide such information for any further parent/subsidiary relationships.

N/A

- e. If the Company is a successor to, or has been succeeded by, another company, identify such other company and provide the same information requested above for the predecessor or successor company.

N/A

- f. If the Company transacted business with Bayonne Barrel & Drum in the name of an entity not disclosed above, give the name of such entity and state its relationship to the Company.

N/A

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2. Company's Relationship to Bayonne Barrel & Drum

- a. State whether the Company or any Company facility transacted any business with Bayonne Barrel & Drum for the disposal, treatment, or storage of any barrels, drums, or other containers (hereinafter collectively referred to as "Containers").

No

- i. If so, describe the relationship (nature of services rendered products sold to the Company) between the Company and Bayonne Barrel & Drum;

N/A

- ii. Provide copies of any contracts or agreements between the Company and Bayonne Barrel & Drum;

N/A

- iii. For each such facility, state the nature of the operations conducted at the facility, including the time period in which the facility operated; and

N/A

- iv. For each such facility, state its name, address, and current RCRA Identification Number.

N/A

- b. In addition, if the Company transacted business with Bayonne Barrel & Drum, provide the following information for each transaction:

- i. Identify the specific dates of each transaction. Where an exact date cannot be provided for a transaction, provide an approximation by month and year;

N/A

- ii. Identify the number of Containers that were the subject of each such transaction;

N/A

- iii. Generically describe each Container that was the subject of each such transaction (example: closed-head steel drums, etc.);

N/A

- iv. Identify the intended purpose of each such transaction;

N/A

- v. State whether each Container that was the subject of the transaction contained any substance at the time of the transaction. As to each Container that contained any substance:

N/A

- (1) Identify each such substance, including its chemical content, physical state, quantity by volume and weight, and other characteristics; and

N/A

- (2) Provide all written analyses that may have been made for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance;

N/A

- vi. If you contend that any such Container did not contain any substance at the time of the transaction:

- (1) State whether such container had previously been used by the Company to contain any substance, and if so:

N/A

- (a) Identify all substances previously contained within such Container, including its chemical content, physical state, and other characteristics; and

N/A

- (b) Provide as to such substances, all written analyses that may have been made of each such substance or which may be in the custody or control of the Company

and all material safety data sheets, if any, relating to each such substance;

N/A

- vii. Describe in detail any treatment of any Container that may have been performed by or on behalf of the Company prior to the time that the Container was transferred from the Company, including any process or procedure by which the Container was emptied or cleaned;

N/A

- viii. Provide copies of all documents relating in any way to each transaction, including copies of delivery receipts, invoices, or payment devices;

N/A

- ix. Identify all persons who might have knowledge of the transaction or who had any responsibility regarding the transaction; and

N/A

- x. If you sent any Container by means of any third party transporter, identify each such transporter, including the name and address of such transporter, and identify in which of the transactions such transporter acted.

N/A

3. Identify any other person (e.g., individual, company, partnership, etc.) having knowledge of facts relating to the questions which are the subject of this inquiry. For each such person that you identify, provide the name, address, and telephone number of that person, and the basis of your belief that he or she has such knowledge. For past and present employees, include their job title and a description of their responsibilities.

Joseph F. Mascuch
118 Victory Road
Springfield, New Jersey 07081
(201) 379-5900
Vice-President of Company
Supervises day-to-day operations of Company

Gene Pastrick
Industrial Compliance Service
2 Ovington Avenue
Edison, New Jersey 08817
Consultant for Company
(908) 985-9121

Frank J. Mascuch
118 Victory Road
Springfield, New Jersey 07081
(201) 379-5900
President of Company

Walter Baluta
118 Victory Road
Springfield, New Jersey
Accountant for Company

4. Identify each person consulted in responding to these questions and correlate each person to the question on which he or she was consulted.

Frank J. Mascuch, Question 1

Joseph F. Mascuch, Questions 2 - 7

Gene Pastrick, Question 2

Walter Baluta, Questions 5 & 6

5. Provide a list of all insurance policies and indemnification agreements held or entered into by you that may indemnify you against any liability that you may be found to have under CERCLA. Specify the insurer, type of policy, effective dates, and state per occurrence policy limits for each policy. Copies of policies may be provided in lieu of a narrative response. In response to this request, please provide not only those policies and agreements that are currently in effect, but also those in effect since your company began sending Containers to the Site.

The Company objects to this Question 5 in that the Company did not send Containers to the Site. Notwithstanding and without waiving this objection, the Company provides the following information: (Please note that neither the Company nor its insurance agent have records of policies issued to the Company prior to 1982. Please note also that the policy limits for the earlier policies could not be ascertained from Company records.)

<u>Insurer</u>	<u>Policy Number</u>	<u>Eff. Date</u>	<u>Type of Policy</u>
Aetna	AE-38GL388535CC	10/82-10/83	Liab./Comp.
Aetna	AE-38GL482657CC	10/84-10/85	Liab./Comp.
Aetna	AE-38GL529812CC	10/84-10/85	Liab./Comp.
Aetna	AE-38GL613362CC	10/85-10/86	Liab./Comp.
Hartford	13UUNCQ0946	10/95-10/96	Liab./Comp. (\$1,000,000)

6. State whether there exists any agreement or contract (other than an insurance policy) which may indemnify the Company, present or past directors, officers or owners of shares in the Company, for any liability that may result under CERCLA. Provide a copy of any such agreement or contract. Identify any agreement or contract that you are unable to locate or obtain.

No

7. Supply any additional information or documents that may be relevant or useful to identify other sources who disposed of or transported Containers to the Site.

N/A

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey

County of Union

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Joseph F. Mascuch

NAME (print or type)

Vice President


TITLE (print or type)



SIGNATURE

MARY PASHAIAN
Notary Public, State of New Jersey
Commission Expires June 23, 1998

Sworn to me before this 27TH
day of October, 1995


Notary Public